

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KIM CARRUTH	:	
	:	
Plaintiff,	:	Civil Action No. 18-CV-2061
	:	
v.	:	
	:	
STATE OF PENNSYLVANIA, et al.	:	
	:	
Defendants.	:	

**DEFENDANT FEDERAL RESERVE BANK OF PHILADELPHIA’S
MOTION TO DISMISS**

Pursuant to the Federal Rules of Civil Procedure, defendant Federal Reserve Bank of Philadelphia, including its President, Patrick Harker (collectively the “FRBP”), by its undersigned counsel, moves this Court to dismiss the Complaint against it on the following grounds:

1. Pursuant to Federal Rule of Civil Procedure 12(b)(6), the complaint fails to state a claim upon which relief can be granted as against defendant FRBP.
2. To the extent the complaint attempts to state a claim against the “Administrative Reserve Bank”, no such entity exists.
3. Service of process on defendant FRBP was insufficient; as such, the matter should be dismissed pursuant to Federal Rule of Civil Procedure 12(b)(5).
4. In the alternative, the Bank moves pursuant to Rule 12(e) for an order requiring Plaintiff to provide a more definite statement of claims, as the current Complaint is almost entirely unintelligible.
5. A Brief in Support of the Motion to Dismiss is attached hereto and incorporated herein by reference.

WHEREFORE, for the reasons set forth herein and in the Brief in Support of defendant Federal Reserve Bank of Philadelphia, including its President, Patrick Harker, hereby moves for the dismissal of the Complaint with prejudice; or in the alternative, for a more definite statement of the claim asserted against the Federal Reserve Bank of Philadelphia.

Respectfully submitted,

By: /s/ **Kori A. Connelly**
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